## REMARKS

Claims 87 to 107 are pending in the application, all of which have been amended to define still more clearly what Applicants regard as their invention, and of which Claims 87, 93 and 99 are independent.

In the outstanding Office Action, Claims 87-107 were rejected under 35 U.S.C. § 103(a) as being obvious from U.S. Patent 6,351,320 (Shin) in view of Applicant's admitted prior art.

Independent Claim 87 is directed to a computer program product comprising a computer readable medium storing a printer driver program for performing processing of image data to be transmitted to a printer. The program itself comprises a database and a program module. According to Claim 87, the database includes plural process tables, which include at least a first process table and a second process table. The program module is for loading the first process table and the second process table corresponding to a designated print mode from the database referring to a mode table which specifies the first and second process tables corresponding to a print mode.

In addition, according to Claim 87, the program module is for performing first and second processes using the first and second processes tables loaded by the program module, respectively.

The process tables are supported by LUT2, and the mode table, by LUT1 (see, e.g., Fig. 2).[1] The process table(s) was the "first table(s)" and the mode table was the "second table" before the present claim amendments. In Fig. 2, for example, the LUT1 indicates a correspondence between a print mode and table IDs of LUT 2. The LUT 2 are

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[1] It is of course to be understood that the claim scope is not limited by any of the details of the particular embodiments referred to by way of illustration or for support.

tables utilized for image processing. For this reason, Applicants have renamed adopted the new claim terminology shown above, solely to clarify the claims.

The first process table and the second process table correspond to, for example, a color collection table, color conversion table, gray scale correction table and dither matrix table.

With regard to dependent Claims 105-07, Applicants point out that the specification describes that the print mode is determined by a print condition such as a paper type, print quality and a quantization method, in page 37, lines 3 and 4.

For at least the following reasons, it is believed clear that Claim 87 and the other claims are allowable over the prior art.

*Shin* relates to a printer driver that converts the RGB color system into the YMC color system using LUTs for the plural medium types. As shown in Fig. 5, one of the LUTs is utilized in response to the designated medium type.

Applicants submit, however, that nothing has been found in *Shin* that would teach of suggest the recited mode table specifying plural process tables corresponding to a designated print mode. According to *Shin*, the printer driver uses any one table from among look-up tables LUT1 to LUT 4 to convert RGB color into CMY color in accordance with a designated medium type. The mode table recited in Claim 87 is not taught in *Shin* even if it is assumed that the tables LUT1 to LUT 4 corresponded to the process tables in Claim 87.

In addition, *Shin* fails to disclose, as well as the mode table, "loading the first process table and the second process table corresponding to a designated print mode from said database referring a mode table which specifies the first and second process tables corresponding to a print mode", and "performing first and second processes using

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the first and the second process tables loaded by said program module, respectively", as recited in Claim 87.

By virtue of these various characteristics, however, the program product of Claim 87 provides the benefit that one can obtain the first and second tables, e.g. a color conversion table and a dither matrix table, utilized in a designated mode with one time search (without plural searches) to process data using the obtained tables.

For at least these reasons, therefore, Claim 87 is believed clearly to be allowable over *Shin*, modified as proposed in the Office Action, or in any other permissible fashion (if any).

Independent Claims 93 and 99 are method and computer claims, respectively, corresponding to program-product Claim 87, and are believed to be patentable for at least the same reasons as discussed above in connection with Claim 87.

A review of the other art of record has failed to reveal anything which, in Applicants' opinion, would remedy the deficiencies of the art discussed above, as a reference against the independent claims herein. Those claims are therefore believed patentable over the art of record.

The other claims in this application are each dependent from one or another of the independent claims discussed above and are therefore believed patentable for the same reasons. Since each dependent claim is also deemed to define an additional aspect of the invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.

In view of the foregoing amendments and remarks, Applicants respectfully request favorable reconsideration and early passage to issue of the present application.

Applicants' undersigned attorney may be reached in our New York office by telephone at (212) 218-2100. All correspondence should continue to be directed to our below listed address.

Respectfully submitted,

Leonard P. Diana
Attorney for Applicant
Registration No. 29,296

FITZPATRICK, CELLA, HARPER & SCINTO
30 Rockefeller Plaza
New York, New York  10112-3801
Facsimile:  (212) 218-2200

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